


B1040 (FORM 1040) (12/15)

<b>ADVERSARY PROCEEDING COVER SHEET</b> (Instructions on Reverse)		<b>ADVERSARY PROCEEDING NUMBER</b> (Court Use Only)	
<b>PLAINTIFFS</b> Leslie Klein 322 N. June Street Los Angeles, CA 90001		<b>DEFENDANTS</b> Joseph Vago and Erica Vago c/o Brian A. Procel/Procel Law, PC 401 Wilshire Blvd., 12 Floor, Santa Monica, CA 90401	
<b>ATTORNEYS (Firm Name, Address, and Telephone No.)</b> Michael Jay Berger/Law Offices of Michael Jay Berger 9454 Wilshire Blvd., 6th Floor, Beverly Hills, CA 90212		<b>ATTORNEYS (If Known)</b> Brian A. Procel/Procel Law, PC 401 Wilshire Blvd., 12 Floor, Santa Monica, CA 90401	
<b>PARTY (Check One Box Only)</b> <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee		<b>PARTY (Check One Box Only)</b> <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input checked="" type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	
<b>CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED)</b> <b>COMPLAINT FOR:</b> (1) AVOIDANCE OF PREFERENCE [11 U.S.C. § 547]; (2) RECOVERY OF AVOIDED TRANSFER [11 U.S.C. § 550(a)]; AND (3) AUTOMATIC PRESERVATION OF AVOIDED TRANSFER [11 U.S.C. § 551]			
<b>NATURE OF SUIT</b>			
(Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)			
<b>FRBP 7001(1) – Recovery of Money/Property</b> <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input checked="" type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property - other  <b>FRBP 7001(2) – Validity, Priority or Extent of Lien</b> <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property  <b>FRBP 7001(3) – Approval of Sale of Property</b> <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h)  <b>FRBP 7001(4) – Objection/Revocation of Discharge</b> <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e)  <b>FRBP 7001(5) – Revocation of Confirmation</b> <input type="checkbox"/> 51-Revocation of confirmation  <b>FRBP 7001(6) – Dischargeability</b> <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny (continued next column)		<b>FRBP 7001(6) – Dischargeability (continued)</b> <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other  <b>FRBP 7001(7) – Injunctive Relief</b> <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input type="checkbox"/> 72-Injunctive relief – other  <b>FRBP 7001(8) Subordination of Claim or Interest</b> <input type="checkbox"/> 81-Subordination of claim or interest  <b>FRBP 7001(9) Declaratory Judgment</b> <input type="checkbox"/> 91-Declaratory judgment  <b>FRBP 7001(10) Determination of Removed Action</b> <input type="checkbox"/> 01-Determination of removed claim or cause  <b>Other</b> <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)	
<input type="checkbox"/> Check if this case involves a substantive issue of state law		<input type="checkbox"/> Check if this is asserted to be a class action under FRCP 23	
<input type="checkbox"/> Check if a jury trial is demanded in complaint		Demand \$	
Other Relief Sought Plaintiff seeks avoidance of Abstracts of Judgment by Joseph and Erica Vago first recorded on December 16, 2022 and an Amended Abstract of Judgment was recorded on January 12, 2023, which were both within 90 days of Plaintiff's Bankruptcy petition date of February 22, 2023.			

**B1040 (FORM 1040) (12/15)**

<b>BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES</b>		
NAME OF DEBTOR Leslie Klein		BANKRUPTCY CASE NO. 2:23-bk-10990-SK
DISTRICT IN WHICH CASE IS PENDING Central District	DIVISION OFFICE Los Angeles	NAME OF JUDGE Hon. Sandra R. Klein
<b>RELATED ADVERSARY PROCEEDING (IF ANY)</b>		
PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF) 		
DATE 5/5/2023	PRINT NAME OF ATTORNEY (OR PLAINTIFF) Michael Jay Berger	

**INSTRUCTIONS**

The filing of a bankruptcy case creates an "estate" under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor's discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also must complete and file Form 1040, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court's Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 1040 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff's attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

**Plaintiffs and Defendants.** Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

**Attorneys.** Give the names and addresses of the attorneys, if known.

**Party.** Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

**Demand.** Enter the dollar amount being demanded in the complaint.

**Signature.** This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

MICHAEL JAY BERGER (State Bar # 100291)  
LAW OFFICES OF MICHAEL JAY BERGER  
9454 Wilshire Boulevard, 6th Floor  
Beverly Hills, California 90212  
T: 1.310.271.6223 | F: 1.310.271.9805  
E: michael.berger@bankruptcypower.com

Proposed Counsel for Debtor in Possession,  
Leslie Klein

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION

In re  
Leslie Klein,  
Debtor.

Case No. 2:23-bk-10990-SK

Chapter 11

**COMPLAINT FOR:**

Leslie Klein, an individual,  
Plaintiff,  
v.

Joseph Vago, and Erica Vago, individuals,  
Defendants.

**(1) AVOIDANCE OF PREFERENCE**  
**[11 U.S.C. § 547];**

**(2) RECOVERY OF AVOIDED**  
**TRANSFER [11 U.S.C. § 550(a)];**  
**AND**

**(3) AUTOMATIC PRESERVATION**  
**OF AVOIDED TRANSFER [11**  
**U.S.C. § 551]**

Leslie Klein, the Debtor and Debtor-in-Possession in the above-referenced chapter 11  
bankruptcy case (the "Plaintiff" and/or the "Debtor") respectfully alleges and avers in his complaint  
to avoid, recover and preserve avoided transfer, as follows:

**JURISDICTION AND VENUE**

1. This Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C.  
Sections 151, 157(b)(1), and 1334(a).

2. This adversary proceeding is commenced pursuant to Rule 7001, et seq. of the Federal Rules of Bankruptcy Procedure and Sections 502, 547, 550, and 551 of 11 U.S.C. Section 101 et seq. (the “Bankruptcy Code”).

3. Venue in this Court is proper pursuant to 28 U.S.C. Section 1409(a) as this adversary proceeding arises under and in connection with a case under Title 11 which is pending in this District.

4. This is a core proceeding as defined by 28 U.S.C. Section 157(b)(2)(A), (B), (F), and (O).

**PARTIES**

5. On February 22, 2023 (the “Petition Date”), Leslie Klein commenced his bankruptcy case by filing voluntary petition for relief under Title 11, Chapter 11 of the United States Code [Case No.: 2:23-bk-10990-SK] (the “Bankruptcy Case”).

6. Plaintiff brings this action in his capacity as the Debtor and Debtor-in-Possession in the Bankruptcy Case.

7. Plaintiff is, and at all times mentioned herein, an individual residing in the County of Los Angeles, State of California.

8. Plaintiff is informed and believes, and thereon alleges, that Defendants Joseph and Erica Vago (the “Vagos” or “Defendants”) are, and at all times mentioned herein, residents of the County of Los Angeles, State of California.

9. Plaintiff does not have personal knowledge of all the facts alleged in this Complaint and, therefore, alleges certain facts on information and belief. Plaintiff reserves his right to amend this Complaint to allege additional claims against the Defendants and to challenge and recover transfers made to or for the benefit of the Defendants in addition to those transfers alleged in this Complaint.

10. On April 4, 2023, Defendants filed a Proof of Claim in Debtor's underlying  
Bankruptcy case asserting a prepetition claim in the sum of \$24,880,721.51 as a secured claim by  
virtue of a Judgment on Special Verdict entered on December 2, 2022. The Defendants recorded  
an Abstract of Judgment in the Los Angeles County Recorder's Office on December 16, 2022  
(Recording No.: 20221178779), and Defendants recorded an Amended Abstract of Judgment and  
Notice of Judgment Lien in the Los Angeles County Recorder's Office on January 12, 2023  
(Recording No.: 20230026369). Defendants were, at all times material hereto, creditors of the  
Debtor during the period commencing ninety (90) days prior to the Petition Date and concluding  
on the Petition Date and for whose benefit certain of the recoverable transfer alleged in this  
Complaint were made and/or an immediate or mediate transferee of such recoverable transfer.

#### **GENERAL ALLEGATIONS**

11. As set forth in **Exhibit-A**, which is attached hereto and specifically incorporated  
herein by reference, Plaintiff is informed and believes, and on that basis alleges thereon, that  
Defendants recorded an Abstract of Judgment in the Los Angeles County Recorder's Office on or  
about December 16, 2022 (Recording No.: 20221178779), and Defendants recorded an Amended  
Abstract of Judgment and Notice of Judgment Lien in the Los Angeles County Recorder's Office  
on or about January 12, 2023 (Recording No.: 20230026369) to perfect a security interest within  
the ninety-day preference period created by 11 U.S.C. § 547. Defendants' action of filing the  
Abstract of Judgments and Notice of Judgment Lien constitutes a transfer of property to or for the  
benefit of the Defendant within the ninety (90) days prior to the Petition Date (the "Transfer").

12. Plaintiff is informed and believes, and on that basis alleges thereon, that prior to  
receiving the Transfer, the Plaintiff-Debtor was indebted to the Defendants. After such debt was  
created, the Defendants made the Transfer on account of those obligations. As such, the Transfer  
was payment on account of antecedent debt owed by the Plaintiff-Debtor to the Defendants.

**FIRST CLAIM FOR RELIEF**

[FOR AVOIDANCE OF PREFERENTIAL TRANSFER – 11 U.S.C. §547(b)]

13. Plaintiff re-alleged and incorporates by this reference each and every allegation set forth in paragraphs 1 through 12, inclusive, as though fully set forth herein.

14. Plaintiff is informed and believes, and on that basis alleges thereon, that the Transfer was of a property interest of the Plaintiff-Debtor.

15. Plaintiff is informed and believes, and on that basis alleges thereon, that the Transfer was made to or for the benefit of Defendants at a time in which Defendants were creditors of the Plaintiff-Debtor, as the term “creditor” is defined by 11 U.S.C. Section 101(10).

16. Plaintiff is informed and believes, and on that basis alleges thereon, that the Transfer was for or on account of an antecedent debt owed by the Plaintiff-Debtor to Defendants before such Transfer was made.

17. Plaintiff is informed and believes, and on that basis alleges thereon, that the Transfer was made while the Plaintiff-Debtor was insolvent.

18. Plaintiff is informed and believes, and on that basis alleges thereon, that the Transfer enabled Defendants to receive more than Defendants would otherwise have received if (a) Plaintiff-Debtor’s bankruptcy case was a case under chapter 7 of the Bankruptcy Code; (b) the Transfer had not been made; and (c) Defendants received payment of such debt to the extent provided by the provisions of the Bankruptcy Code.

19. The Transfer may be avoided pursuant to 11 U.S.C. §547(b).

20. Interest on the Transfer has accrued and continues to accrue from the date the Transfer was made.

21. Plaintiff is entitled to an order and judgment under 11 U.S.C. §547(b) that the Transfer is avoided pursuant to 11 U.S.C. §547(b).

**SECOND CLAIM FOR RELIEF**

[FOR RECOVERY OF AVOIDED TRANSFER - 11 U.S.C. § 550]

22. Plaintiff re-alleged and incorporates by this reference each and every allegation set forth in paragraphs 1 through 21, inclusive, as though fully set forth herein.

23. Plaintiff is informed and believes and, based upon such information and belief, alleges that Defendants were the initial transferees of the Transfer, or the entity for whose benefit the Transfer was made, or is the immediate or mediate transferees of the initial transferee receiving such Transfer, or any of them.

24. Pursuant to 11 U.S.C. §550, upon avoidance of the Transfer under the First Claim for Relief alleged herein, Plaintiff is entitled to avoid the Transfer under 11 U.S.C. §547(b) and to recover the value of the property transferred under the Transfer and/or the amount of the Transfer, together with interest thereon at the maximum legal rate from the date of the Transfer, as set forth above.

25. Plaintiff is entitled to an order and judgment under 11 U.S.C. §550 that the Transfer is avoided and recovered for the benefit of the Plaintiff-Debtor's bankruptcy estate.

**THIRD CLAIM FOR RELIEF**

[FOR PRESERVATION OF AVOIDED TRANSFER – 11 U.S.C. §551]

26. Plaintiff re-alleged and incorporates by this reference each and every allegation set forth in paragraphs 1 through 25, inclusive, as though fully set forth herein.

27. Pursuant to 11 U.S.C. §551, Plaintiff is entitled to preserve any of the Transfer avoided under the First Claim for Relief alleged herein for the benefit of the Plaintiff-Debtor's bankruptcy estate pursuant to 11 U.S.C. §551.

28. Plaintiff is entitled to an order and judgment under 11 U.S.C. §551 that the Transfer is preserved for the benefit of the Plaintiff-Debtor's bankruptcy estate.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for a judgment on this Complaint, as it may be amended  
from time to time, as follows:

1. For avoidance of the Transfer under 11 U.S.C. §547(b);
2. For recovery from Defendants by Plaintiff of the value of the property transferred  
under the Transfer and/or the amount of the Transfer under 11 U.S.C. §550;
3. For preservation of avoided Transfer for the Plaintiff-Debtor's bankruptcy estate;
4. Attorney's fees, costs and expenses, to the extent recoverable under applicable law  
and the evidence submitted to the Bankruptcy Court; and
5. For such other and further relief as the Court deems just and proper.

Dated: May 5, 2023

LAW OFFICES OF MICHAEL JAY BERGER

By: 

MICHAEL JAY BERGER  
Attorney for Plaintiff  
Leslie Klein



Fill in this information to identify the case:

Debtor 1 LESLIE KLEIN

Debtor 2  
(Spouse, if filing) \_\_\_\_\_

United States Bankruptcy Court for the: Central District of California

Case number 2:23-10990-SK

## Official Form 410

### Proof of Claim

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

#### Part 1: Identify the Claim

1. Who is the current creditor?	<u>ERICA VAGO and JOSEPH VAGO</u> Name of the current creditor (the person or entity to be paid for this claim)  Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b>  <u>Brian A. Procel / Procel Law, PC</u> Name <u>401 Wilshire Blvd, 12th Floor</u> Number Street <u>Santa Monica CA 90401</u> City State ZIP Code  Contact phone <u>424-788-4538</u> Contact email <u>brian@procel-law.com</u>	<b>Where should payments to the creditor be sent? (if different)</b>  <u>Brian A. Procel / Procel Law, PC</u> Name <u>401 Wilshire Blvd, 12th Floor</u> Number Street <u>Santa Monica CA 90401</u> City State ZIP Code  Contact phone <u>424-788-4538</u> Contact email <u>brian@procel-law.com</u>
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____		
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor? ☒ No  
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_\_
7. How much is the claim? \$ 24,880,721.51. Does this amount include interest or other charges?  
☐ No  
☒ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  
Limit disclosing information that is entitled to privacy, such as health care information.  
  
State Court Judgment on Special Verdict
9. Is all or part of the claim secured? ☐ No  
☒ Yes. The claim is secured by a lien on property.  
**Nature of property:**  
☒ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
☐ Motor vehicle  
☐ Other. Describe: \_\_\_\_\_  
  
**Basis for perfection:** Exhibit 1 Judgment; Exhibit 2 Abstracts, etc.  
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  
  
**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amounts should match the amount in line 7.)  
  
**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_  
  
**Annual Interest Rate** (when case was filed) 10.00 %  
☒ Fixed  
☐ Variable
10. Is this claim based on a lease? ☒ No  
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_
11. Is this claim subject to a right of setoff? ☒ No  
☐ Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No

☐ Yes. Check all that apply:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,025\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$13,650\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

Amount entitled to priority

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.

### Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

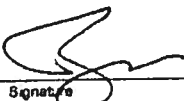
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 03/03/2023  
MM / DD / YYYY

  
Signature

Print the name of the person who is completing and signing this claim:

Name Brian A. Procel  
First name Middle name Last name

Title Counsel for Claimant

Company Procel Law, PC  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 401 Wilshire Blvd, 12th Floor  
Number Street  
Santa Monica CA 90401  
City State ZIP Code

Contact phone 424-788-4538 Email brian@procel-law.com

# EXHIBIT 1

# EXHIBIT 1

**INTEREST CALCULATION ATTACHMENT TO PROOF OF CLAIM**

Amount of Judgment: Exhibit 1)	\$24,334,038.99 (see pp. 22 and 27 of
Days between entry of judgment and Petition Date:	82
Post-judgment rate of interest:	10%
Post-judgment interest as of Petition Date:	\$546,682.52
<b>Total Amount of Claim as of Petition Date:</b>	<b>\$24,880,721.51</b>

Electronically Received 11/15/2022 10:32 AM

1 BRIAN A. PROCEL (State Bar No. 218657)  
brian@procel-law.com  
2 PROCEL LAW, PC  
401 Wilshire Boulevard  
3 12th Floor  
Santa Monica, California 90401  
4 Telephone: (424) 788-4538  
5 Attorneys for Plaintiffs  
ERICA VAGO and JOSEPH VAGO

**FILED**  
Superior Court of California  
County of Los Angeles

**12/02/2022**

Sharon R. Carter, Executive Officer / Clerk of Court

By: M. Ventura Deputy

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11 ERICA VAGO and JOSEPH VAGO,

12 Plaintiffs,

13 v.

14 LESLIE KLEIN; LES KLEIN &  
ASSOCIATES, INC.; KENNETH KOLEV  
15 KLEIN; and LAW OFFICE OF KENNETH  
KLEIN, P.C.,

16 Defendants.

**CASE NO. 20STCV25050**

**~~PROPOSED~~ JUDGMENT ON SPECIAL  
VERDICT**

Assigned for All Purposes to:  
Hon. Terry A. Green, Dept. 14

Action Filed: July 1, 2020  
Trial Date: August 29, 2022

**~~PROPOSED~~ JUDGMENT  
EXHIBIT "1"**

1 This action came on regularly for trial on August 29, 2022, in Department 14 of the  
2 Superior Court, the Honorable Terry A. Green, Judge Presiding;

3 Plaintiffs Erica and Joseph Vago (collectively, "Plaintiffs") appearing by attorney Brian  
4 Procel, Esq.; and Defendants Leslie Klein and Les Klein & Associates, Inc. (collectively,  
5 "Defendants") appearing by attorney Jeffrey Slott.

6 A jury of twelve (12) persons was regularly impaneled and sworn and agreed to try the  
7 cause. Witnesses were sworn and testified. After hearing the evidence and arguments of counsel,  
8 the jury was duly instructed by the Court and the cause was submitted to the jury with directions  
9 to return a special verdict. The jury deliberated and thereafter returned to court with its special  
10 verdict submitted to the jury and the answers given thereto by the jury, which verdict was in words  
11 and figures as follows, to wit:

12  
13 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
14 **(BY ERICA VAGO AGAINST DEFENDNTS)**  
15

16 1. Was Mr. Klein's conduct outrageous?

17 ☒ X Yes ☐ No

18 If your answer to question 1 is yes, then answer question 2. If you answered no,  
19 stop here, answer no further questions, and have the presiding juror sign and date  
20 this form.

21 2. Did Mr. Klein intend to cause Erica Vago emotional distress?

22 ☐ Yes ☒ X No

23 If your answer to question 2 is yes, then answer question 4. If you answered no, go  
24 to question 3.

25 3. Did Mr. Klein act with reckless disregard of the probability that Erica Vago would  
26 suffer emotional distress, knowing that Erica Vago was present when the conduct  
27 occurred?

28 ☒ X Yes ☐ No

1 If your answer to question 3 is yes, then answer question 4. If you answered no,  
2 stop here, answer no further questions, and have the presiding juror sign and date  
3 this form.

4 4. Did Erica Vago suffer severe emotional distress?

5 ☐ Yes ☒ No

6 If your answer to question 4 is yes, then answer question 5. If you answered no,  
7 stop here, answer no further questions, and have the presiding juror sign and date  
8 this form.

9 5. Was Mr. Klein's conduct a substantial factor in causing Erica Vago's severe  
10 emotional distress?

11 ☐ Yes ☐ No

12 If your answer to question 5 is yes, then answer question 6. If you answered no,  
13 stop here, answer no further questions, and have the presiding juror sign and date  
14 this form.

15 6. What are Erica Vago's damages for pain and suffering?

16 \$ N/A

18 TOTAL \$

19 N/A

21 Signed: /Signature  
22 Presiding Juror

23 Dated: September 15, 2022



**INTENTIONAL MISREPRESENTATION**  
**(BY ERICA VAGO AGAINST DEFENDNTS)**

We answer the questions submitted to us as follows:

1. Did Mr. Klein make a false representation of a fact to Erica Vago?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Mr. Klein know that the representation was false, or did he make the representation recklessly and without regard for its truth?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Erica Vago reasonably rely on the representation?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Was Erica Vago's reliance on Mr. Klein's representation a substantial factor in causing harm to Erica Vago?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. What are Erica Vago's economic damages?

\$ 8,300,000

Please answer question 6.

6. What are Erica Vago's noneconomic damages for pain and suffering?

\$ 0

TOTAL \$ 8,300,000

Signed: /Signature  
Presiding Juror

Dated: September 15, 2022

**CONCEALMENT  
(BY ERICA VAGO AGAINST DEFENDNTS)**

We answer the questions submitted to us as follows:

1. Did Mr. Klein intentionally fail to disclose a fact that Erica Vago did not know and could not reasonably have discovered?

X Yes             No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Mr. Klein intend to deceive Erica Vago by concealing the fact?

       X Yes             No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Had the omitted information been disclosed, would Erica Vago reasonably have behaved differently?

       X Yes             No

1 If your answer to question 3 is yes, then answer question 4. If you answered no,  
2 stop here, answer no further questions, and have the presiding juror sign and date  
3 this form.

- 4 4. Was Mr. Klein's concealment a substantial factor in causing harm to Erica Vago?  
5  X  Yes   No

6 If your answer to question 4 is yes, then answer question 5. If you answered no,  
7 stop here, answer no further questions, and have the presiding juror sign and date  
8 this form.

- 9 5. What are Erica Vago's economic damages?

10 \$ 8,300,000

11 Please answer question 6.

- 12 6. What are Erica Vago's noneconomic damages for pain and suffering?

13 \$  0

14  
15 TOTAL \$ 8,300,000

16  
17 Signed:  /Signature   
18 Presiding Juror

19 Dated: September 15, 2022  
20  
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**FALSE PROMISE**

**(BY ERICA VAGO AGAINST DEFENDNTS)**

We answer the questions submitted to us as follows:

1. Did Mr. Klein make a promise to Erica Vago?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Mr. Klein intend to perform this promise when he made it?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Mr. Klein intend that Erica Vago rely on this promise?

☐ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Did Erica Vago reasonably rely on this promise?

☐ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Did Mr. Klein fail to perform the promised act?

☐ Yes ☐ No

If your answer to question 5 is yes, then answer question 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

6. Was Erica Vago's reliance on Mr. Klein's promise a substantial factor in causing harm to Erica Vago?

\_\_\_\_ Yes \_\_\_\_ No

If your answer to question 6 is yes, then answer question 7. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

7. What are Erica Vago's economic damages?

\$ \_N/A\_\_\_\_\_

Please answer question 8.

8. What are Erica Vago's noneconomic damages for pain and suffering?

\$ \_N/A\_\_\_\_\_

TOTAL \$ \_N/A\_\_\_\_\_

Signed:                     /Signature                      
Presiding Juror

Dated: September 15, 2022

**FINANCIAL ABUSE**

**(BY ERICA VAGO AGAINST DEFENDANTS)**

We answer the questions submitted to us as follows:

1. Did Mr. Klein retain Erica Vago's money or property?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Were Erica Vago 65 years of age or older at the time of the conduct?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Mr. Klein retain the money or property for a wrongful use or with the intent to defraud?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Were Erica Vago harmed?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Was Mr. Klein's conduct a substantial factor in causing Erica Vago's harm?

☒ Yes ☐ No

If your answer to question 5 is yes, then answer question 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

6. What are Erica Vago's economic damages?

\$ 8,300,000

TOTAL \$8,300,000

Signed: /Signature  
Presiding Juror

Dated: September 15, 2022

**PUNITIVE DAMAGES  
(BY ERICA VAGO AGAINST DEFENDNTS)**

We answer the questions submitted to us as follows:

1. Did Mr. Klein engage in the conduct with malice, oppression, or fraud?

  X   Yes        No

Signed: /Signature  
Presiding Juror

Dated: September 15, 2022

**PUNITIVE DAMAGES AGAINST EMPLOYER OR PRINCIPAL FOR CONDUCT  
OF A SPECIFIC AGENT OR EMPLOYEE  
(BY ERICA VAGO AGAINST DEFENDNTS)**

We answer the questions submitted to us as follows:

1. Did Mr. Klein engage in the conduct with malice, oppression, or fraud?

  X   Yes        No

1 If your answer to question 1 is yes, then answer question 2. If you answered no,  
2 stop here, answer no further questions, and have the presiding juror sign and date  
3 this form.

4  
5 Signed:                      /Signature  
6 Presiding Juror

7 Dated: September 15, 2022

8 **BREACH OF FIDUCIARY DUTY**  
9 **(BY ERICA VAGO AGAINST DEFENDNTS)**

10  
11 1. Mr. Klein owed Erica Vago fiduciary duties to act with the utmost loyalty and honesty.

12 2. Did Mr. Klein breach his fiduciary duties?

13   X   Yes        No

14 If your answer to question 2 is yes, then answer question 3. If you answered no, stop  
15 here, answer no further questions, and have the presiding juror sign and date this form.

16 3. Was Erica Vago harmed?

17   X   Yes        No

18 If your answer to question 3 is yes, then answer question 4. If you answered no, stop  
19 here, answer no further questions, and have the presiding juror sign and date this form.

20 4. Was Mr. Klein's conduct a substantial factor in causing Erica Vago's harm?

21   X   Yes        No

22 If your answer to question 4 is yes, then answer question 5. If you answered no, stop  
23 here, answer no further questions, and have the presiding juror sign and date this form.

24 5. What are Erica Vago's economic damages?

25 \$ 8,300,000

26  
27 TOTAL \$ 8,300,000



Signed: /Signature  
Presiding Juror

Dated: September 15, 2022

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
(BY JOSEPH VAGO AGAINST DEFENDNTS)**

1. Was Mr. Klein's conduct outrageous?

a. ☒ Yes ☐ No

b. If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Mr. Klein intend to cause Joseph Vago emotional distress?

a. ☐ Yes ☒ No

b. If your answer to question 2 is yes, then answer question 4. If you answered no, go to question 3.

3. Did Mr. Klein act with reckless disregard of the probability that Joseph Vago would suffer emotional distress, knowing that Joseph Vago was present when the conduct occurred?

a. ☒ Yes ☐ No

b. If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Did Joseph Vago suffer severe emotional distress?

a. ☒ Yes ☐ No

b. If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

1 5. Was Mr. Klein's conduct a substantial factor in causing Joseph Vago's severe  
2 emotional distress?

3 a.  X  Yes   No

4 b. If your answer to question 5 is yes, then answer question 6. If you answered  
5 no, stop here, answer no further questions, and have the presiding juror sign  
6 and date this form.

7 6. What are Joseph Vago's damages for pain and suffering?

8 a. \$ 400,000

9  
10 TOTAL \$400,000

11  
12 Signed:  /Signature   
13 Presiding Juror

14 Dated: September 15, 2022

15  
16 **INTENTIONAL MISREPRESENTATION**  
17 **(BY JOSEPH VAGO AGAINST DEFENDNTS)**

18  
19 We answer the questions submitted to us as follows:

20 1. Did Mr. Klein make a false representation of a fact to Joseph Vago?

21 a.  X  Yes   No

22 b. If your answer to question 1 is yes, then answer question 2. If you answered  
23 no, stop here, answer no further questions, and have the presiding juror sign  
24 and date this form.

25 2. Did Mr. Klein know that the representation was false, or did he make the  
26 representation recklessly and without regard for its truth?

27 a.  X  Yes   No

b. If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Joseph Vago reasonably rely on the representation?

a.   X   Yes        No

b. If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Was Joseph Vago's reliance on Mr. Klein's representation a substantial factor in causing harm to Joseph Vago?

a.   X   Yes        No

b. If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. What are Joseph Vago's economic damages?

a. \$   0  

b. Please answer question 6.

6. What are Joseph Vago's noneconomic damages for pain and suffering?

a. \$   0  

TOTAL \$   0  

Signed:           /Signature            
Presiding Juror

Dated: September 15, 2022

**CONCEALMENT  
(BY JOSEPH VAGO AGAINST DEFENDNTS)**

1 We answer the questions submitted to us as follows:

- 2 1. Did Mr. Klein intentionally fail to disclose a fact that Joseph Vago did not know  
3 and could not reasonably have discovered?  
4 a. ☒ Yes ☐ No  
5 b. If your answer to question 1 is yes, then answer question 2. If you answered  
6 no, stop here, answer no further questions, and have the presiding juror sign  
7 and date this form.
- 8 2. Did Mr. Klein intend to deceive Joseph Vago by concealing the fact?  
9 a. ☒ Yes ☐ No  
10 b. If your answer to question 2 is yes, then answer question 3. If you answered  
11 no, stop here, answer no further questions, and have the presiding juror sign  
12 and date this form.
- 13 3. Had the omitted information been disclosed, would Joseph Vago reasonably have  
14 behaved differently?  
15 a. ☒ Yes ☐ No  
16 b. If your answer to question 3 is yes, then answer question 4. If you answered  
17 no, stop here, answer no further questions, and have the presiding juror sign  
18 and date this form.
- 19 4. Was Mr. Klein's concealment a substantial factor in causing harm to Joseph Vago?  
20 a. ☒ Yes ☐ No  
21 b. If your answer to question 4 is yes, then answer question 5. If you answered  
22 no, stop here, answer no further questions, and have the presiding juror sign  
23 and date this form.
- 24 5. What are Joseph Vago's economic damages?  
25 a. \$ 0  
26 b. Please answer question 6.
- 27 6. What are Joseph Vago's noneconomic damages for pain and suffering?  
28 a. \$ 0

TOTAL \$ 0

Signed: /Signature  
Presiding Juror

Dated: September 15, 2022

**FALSE PROMISE**  
**(BY JOSEPH VAGO AGAINST DEFENDNTS)**

We answer the questions submitted to us as follows:

1. Did Mr. Klein make a promise to Joseph Vago?

a. X Yes        No

b. If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Mr. Klein intend to perform this promise when he made it?

a. X Yes        No

b. If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Mr. Klein intend that Joseph Vago rely on this promise?

a.        Yes        No

b. If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Did Joseph Vago reasonably rely on this promise?

a.        Yes        No

b. If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Did Mr. Klein fail to perform the promised act?

a. ☐ Yes ☐ No

b. If your answer to question 5 is yes, then answer question 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

6. Was Joseph Vago's reliance on Mr. Klein's promise a substantial factor in causing harm to Joseph Vago?

a. ☐ Yes ☐ No

b. If your answer to question 6 is yes, then answer question 7. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

7. What are Joseph Vago's economic damages?

a. \$ N/A

b. Please answer question 8.

8. What are Joseph Vago's noneconomic damages for pain and suffering?

a. \$ N/A

TOTAL \$ N/A

Signed: /Signature  
Presiding Juror

Dated: September 15, 2022

**FINANCIAL ABUSE**

**(BY JOSEPH VAGO AGAINST DEFENDANTS)**

We answer the questions submitted to us as follows:

1. Did Mr. Klein retain Joseph Vago's money or property?

a. ☐ Yes ☒ No

b. If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Were Joseph Vago 65 years of age or older at the time of the conduct?

a. ☐ Yes ☐ No

b. If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Mr. Klein retain the money or property for a wrongful use or with the intent to defraud?

a. ☐ Yes ☐ No

b. If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Were Joseph Vago harmed?

a. ☐ Yes ☐ No

b. If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Was Mr. Klein's conduct a substantial factor in causing Joseph Vago's harm?

a. ☐ Yes ☐ No

b. If your answer to question 5 is yes, then answer question 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

6. What are Joseph Vago's economic damages?

a. \$ N/A

TOTAL \$ N/A

Signed: /Signature  
Presiding Juror

Dated: September 15, 2022

**PUNITIVE DAMAGES**  
**(BY JOSEPH VAGO AGAINST DEFENDNTS)**

We answer the questions submitted to us as follows:

1. Did Mr. Klein engage in the conduct with malice, oppression, or fraud?

a. X Yes        No

Signed: /Signature  
Presiding Juror

Dated: September 15, 2022

**PUNITIVE DAMAGES AGAINST EMPLOYER OR PRINCIPAL FOR CONDUCT**  
**OF A SPECIFIC AGENT OR EMPLOYEE**  
**(BY JOSEPH VAGO AGAINST DEFENDNTS)**

We answer the questions submitted to us as follows:

1. Did Mr. Klein engage in the conduct with malice, oppression, or fraud?

a. X Yes        No



b. If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

Signed: /Signature  
Presiding Juror

Dated: September 15, 2022

**BREACH OF FIDUCIARY DUTY  
(BY JOSEPH VAGO AGAINST DEFENDNTS)**

1. Mr. Klein owed Joseph Vago fiduciary duties to act with the utmost loyalty and honesty.

2. Did Mr. Klein breach his fiduciary duties?

a. ☒ Yes ☐ No

b. If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Was Joseph Vago harmed?

a. ☒ Yes ☐ No

b. If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Was Mr. Klein's conduct a substantial factor in causing Joseph Vago's harm?

a. ☒ Yes ☐ No

b. If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. What are Joseph Vago's economic damages?

1 a. \$ \_\_\_\_ 0 \_\_\_\_

3 i. TOTAL \$ \_\_\_\_ 0 \_\_\_\_

5 Signed: /Signature  
6 Presiding Juror

7 Dated: September 15, 2022

1 It appearing by reason of said special verdict that Plaintiff Erica Vago is entitled to  
2 judgment against Defendants Leslie Klein and Leslie Klein & Associates.

3 NOW THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that said Erica  
4 Vago shall have and recover from Defendants, jointly and severally:

- 5 1. Compensatory damages in the sum of \$8,300,000;
- 6 2. Prejudgment interest at the rate of 7 (seven) percent in the amount of  
7 \$7,334,038.99;
- 8 3. Punitive damages in the sum of \$8,300,000,
- 9 4. And interest thereon at the rate of ten percent per annum from the date of the  
10 verdict until paid together with costs and disbursements.

11  
12 It further appearing by reason of said special verdict that Plaintiff Joseph Vago is entitled  
13 to judgment against Defendants Leslie Klein and Leslie Klein & Associates.

14 NOW THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that said Joseph  
15 Vago shall have and recover from Defendants, jointly and severally:

- 16 1. \$400,000 for emotional distress
- 17 2. And interest thereon at the rate of ten percent per annum from the date of the  
18 verdict until paid together with costs and disbursements.

19  
20 The total amount of the judgment against Defendants jointly and severally is  
21 \$24,334,038.99.

22  
23 Dated: 12/02/2022



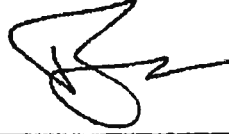
**Terry Green**

Terry Green / Judge

Hon. Terry Green  
Judge of the Superior Court

1 DATED: November 15, 2022

PROCEL LAW, PC



By: \_\_\_\_\_

BRIAN PROCEL  
Attorneys for Plaintiffs  
JOSEPH VAGO and ERICA VAGO

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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address 401 Wilshire Boulevard, 12<sup>th</sup> Floor, Santa Monica, California 90401.

On November 15, 2022, I served true copies of the following document(s) described as:

**[PROPOSED] JUDGMENT ON SPECIAL VERDICT**

on the interested parties in this action as follows:

**SERVICE LIST**

Jeffrey A. Slott  
LAW OFFICES OF JEFFREY A. SLOTT, APC  
15760 Ventura Blvd., Suite 1600  
Encino, CA 91436  
Telephone: (818) 995-1955  
Facsimile: (818) 995-0955  
Email: jslott@aol.com

*Attorneys for Defendants*

LESLIE KLEIN and  
LES KLEIN & ASSOCIATES, INC.

**BY E-MAIL:** I caused a copy of the document(s) to be sent from e-mail address johnpark@procel-law.com to the person(s) at the e-mail address(es) listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 15, 2022, at Santa Monica, California.

/s/ Brian Procel  
Brian Procel

# EXHIBIT 2

# EXHIBIT 2

This page is part of your document - DO NOT DISCARD



**20221178779**



Pages:  
0004

Recorded/Filed in Official Records  
Recorder's Office, Los Angeles County,  
California

12/16/22 AT 02:57PM

FEES:	39.00
TAXES:	0.00
OTHER:	0.00
SB2:	75.00
PAID:	114.00



LEADSHEET



202212160200053

00023052005



013828596

SEQ:  
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SECURE - Daily



THIS FORM IS NOT TO BE DUPLICATED

E13-202212150001263

E441968

EXHIBIT "2"

Page 1 of 31

RECORDING REQUESTED BY

Procel Law, PC

AND WHEN RECORDED MAIL DOCUMENT TO:

NAME Brian Procel

STREET ADDRESS Procel Law, PC  
401 Wilshire Blvd., 12th Floor

CITY, STATE &  
ZIP CODE  
Santa Monica, CA 90401

SPACE ABOVE FOR RECORDER'S USE ONLY

Abstract of Judgment

Title of Document

Pursuant to Senate Bill 2 – Building Homes and Jobs Act (GC Code Section 27388.1), effective January 1, 2018, a fee of seventy-five dollars (\$75.00) shall be paid at the time of recording of every real estate instrument, paper, or notice required or permitted by law to be recorded, except those expressly exempted from payment of recording fees, per each single transaction per parcel of real property. The fee imposed by this section shall not exceed two hundred twenty-five dollars (\$225.00).

- ☐ Exempt from fee per GC 27388.1 (a) (2); recorded concurrently "in connection with" a transfer subject to the imposition of documentary transfer tax (DTT).
- ☐ Exempt from fee per GC 27388.1 (a) (2); recorded concurrently "in connection with" a transfer of real property that is a residential dwelling to an owner-occupier.
- ☐ Exempt from fee per GC 27388.1 (a) (1); fee cap of \$225.00 reached.
- ☐ Exempt from the fee per GC 27388.1 (a) (1); not related to real property.

THIS COVER SHEET ADDED TO PROVIDE ADEQUATE SPACE FOR RECORDING INFORMATION  
(\$3.00 Additional Recording Fee Applies)



EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):

After recording, return to:

Brian Procel (State Bar No. 218657)  
PROCEL LAW, PC  
401 Wilshire Boulevard, 12th Floor  
Santa Monica, California 90401

TEL NO.: (424) 788-4538 FAX NO. (optional):

E-MAIL ADDRESS (Optional): brian@procel-law.com

☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, CA 90024

BRANCH NAME: Stanley Mosk Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: JOSEPH VAGO, ET AL.

DEFENDANT: LESLIE KLEIN, ET AL.

CASE NUMBER:

20STCV25050

**ABSTRACT OF JUDGMENT—CIVIL  
AND SMALL CLAIMS**

☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record  
applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address

Leslie Klein  
322 N. June Street  
Los Angeles, CA 90004

b. Driver's license no. [last 4 digits] and state:

☒ Unknown

c. Social security no. [last 4 digits]:

☒ Unknown

d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

Leslie Klein  
322 N. June Street, Los Angeles, CA 90004

2. ☒ Information on additional judgment debtors is  
shown on page 2.

4. ☒ Information on additional judgment creditors is  
shown on page 2.

3. Judgment creditor (name and address):

Joseph Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401

5. ☐ Original abstract recorded in this county:

Date: December 14, 2022

Brian Procel

a. Date:

b. Instrument No.:

(TYPE OR PRINT NAME)

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
\$24,334,038.99

10. ☐ An ☐ execution lien ☐ attachment lien  
is endorsed on the judgment as follows:

7. All judgment creditors and debtors are listed on this abstract.

a. Amount: \$

8. a. Judgment entered on (date): December 2, 2022

b. In favor of (name and address):

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.

11. A stay of enforcement has

a. ☒ not been ordered by the court.

b. ☐ been ordered by the court effective until  
(date):

[SEAL]



Sherri R. Carter Executive Officer / Clerk of Court

This abstract issued on (date):

12/15/2022

12. a. ☒ I certify that this is a true and correct abstract of  
the judgment entered in this action.

b. ☐ A certified copy of the judgment is attached.

Clerk, by M. Nguyen, Deputy

PLAINTIFF: JOSEPH VAGO, ET AL. DEFENDANT: LESLIE KLEIN, ET AL.	COURT CASE NO.: 20STCV25050
---	--------------------------------

**NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:**

13. Judgment creditor (*name and address*):

Erica Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:**

16. Name and last known address

Les Klein & Associates, Inc.  
1425 Ventura Blvd.  
Sherman Oaks, CA 91423

Driver's license no. [last 4 digits] and state:

☒ Unknown

Social security no. [last 4 digits]:

☒ Unknown

Summons was personally served at or mailed to (*address*):

322 N. June Street  
Los Angeles, CA 90004

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

This page is part of your document - DO NOT DISCARD



**20230026369**



Pages:  
0004

Recorded/Filed in Official Records  
Recorder's Office, Los Angeles County,  
California

01/12/23 AT 03:35PM

FEES:	39.00
TAXES:	0.00
OTHER:	0.00
SB2:	75.00
PAID:	114.00



LEADSHEET



202301120110082

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SEQ:  
01

SECURE - Daily



**THIS FORM IS NOT TO BE DUPLICATED**

E13-202301120110082

ES48170

EXHIBIT "2"

Page 5 of 31

RECORDING REQUESTED BY  
Procel Law, PC

AND WHEN RECORDED MAIL DOCUMENT TO:

NAME Brian Procel

STREET ADDRESS Procel Law, PC  
401 Wilshire Blvd., 12th Floor

CITY, STATE & ZIP CODE  
Santa Monica, CA 90401

SPACE ABOVE FOR RECORDER'S USE ONLY

Amended Abstract of Judgment

Title of Document

Pursuant to Senate Bill 2 – Building Homes and Jobs Act (GC Code Section 27388.1), effective January 1, 2018, a fee of seventy-five dollars (\$75.00) shall be paid at the time of recording of every real estate instrument, paper, or notice required or permitted by law to be recorded, except those expressly exempted from payment of recording fees, per each single transaction per parcel of real property. The fee imposed by this section shall not exceed two hundred twenty-five dollars (\$225.00).

- ☐ Exempt from fee per GC 27388.1 (a) (2); recorded concurrently "in connection with" a transfer subject to the imposition of documentary transfer tax (DTT).
- ☐ Exempt from fee per GC 27388.1 (a) (2); recorded concurrently "in connection with" a transfer of real property that is a residential dwelling to an owner-occupier.
- ☐ Exempt from fee per GC 27388.1 (a) (1); fee cap of \$225.00 reached.
- ☐ Exempt from the fee per GC 27388.1 (a) (1); not related to real property.

THIS COVER SHEET ADDED TO PROVIDE ADEQUATE SPACE FOR RECORDING INFORMATION  
(\$3.00 Additional Recording Fee Applies)

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):  
After recording, return to:  
Brian Procel (State Bar No. 218657)  
Martin Pritikin (State Bar No. 210845)  
PROCEL LAW, PC  
401 Wilshire Boulevard, 12th Floor  
Santa Monica, California 90401  
TEL NO.: (424) 788-4538 FAX NO. (optional):  
E-MAIL ADDRESS (Optional): brian@procel-law.com; marty@procel-law.com  
☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, CA 90024

BRANCH NAME: Stanley Mosk Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: JOSEPH VAGO, ET AL.

DEFENDANT: LESLIE KLEIN, ET AL.

CASE NUMBER:  
20STCV25050

**ABSTRACT OF JUDGMENT—CIVIL  
AND SMALL CLAIMS**

☒ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record  
applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address

Leslie Klein  
322 N. June Street  
Los Angeles, CA 90004

b. Driver's license no. [last 4 digits] and state:

☒ Unknown

c. Social security no. [last 4 digits]: 6944

☐ Unknown

d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

Leslie Klein  
322 N. June Street, Los Angeles, CA 90004

2. ☒ Information on additional judgment debtors is  
shown on page 2.

3. Judgment creditor (name and address):

Joseph Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401

Date: January 11, 2023

Brian Procel

(TYPE OR PRINT NAME)

4. ☒ Information on additional judgment creditors is  
shown on page 2.

5. ☒ Original abstract recorded in this county:  
Los Angeles

a. Date: December 16, 2022

b. Instrument No.: 20221178779

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
\$24,334,038.99

7. All judgment creditors and debtors are listed on this abstract.

8. a. Judgment entered on (date): December 2, 2022

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.

10. ☐ An ☐ execution lien ☐ attachment lien  
is endorsed on the judgment as follows:

a. Amount: \$

b. In favor of (name and address):

11. A stay of enforcement has

a. ☒ not been ordered by the court.

b. ☐ been ordered by the court effective until  
(date):

12. a. ☒ I certify that this is a true and correct abstract of  
the judgment entered in this action.

b. ☐ A certified copy of the judgment is attached.

(SEAL)



David W. Stalton, Executive Officer/Clerk of Court

This abstract issued on (date):

01/12/2023

Clerk, by M. Nguyen, Deputy

PLAINTIFF: JOSEPH VAGO, ET AL. DEFENDANT: LESLIE KLEIN, ET AL.	COURT CASE NO.: 20STCV25050
---	--------------------------------

**NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:**

13. Judgment creditor (*name and address*):

Erica Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:**

16. Name and last known address

Les Klein & Associates, Inc.  
1425 Ventura Blvd.  
Sherman Oaks, CA 91423

Driver's license no. [last 4 digits] and state:

☒ Unknown

Social security no. [last 4 digits]:

☒ Unknown

Summons was personally served at or mailed to (*address*):

322 N. June Street  
Los Angeles, CA 90004

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

**RECORDING REQUESTED  
AND WHEN RECORDED MAIL TO:**

Brian Procel  
PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

111.00  
\* \$ R 0 0 1 4 1 1 3 2 0 2 \$ \*  
2022000409986 8:03 am 12/16/22

90 CR-SC06 A03 3

0.00 0.00 0.00 0.00 6.00 20.00 0.000.0075.00 3.00

THIS SPACE IS FOR RECORDERS USE ONLY

**Abstract of Judgment**

(Title of Document)

***Per Government Code 27388.1(a)(1) "A fee of \$75 dollars shall be paid at the time of recording on every real estate instrument, paper, or notice required or permitted by law to be recorded, except those expressly exempted from payment of recording fees, per each single transaction per parcel or real property. "***

- ☐ Exempt from SB2 fee per GC 27388.1(a)(2); is a transfer subject to the imposition of documentary transfer tax", or
- ☐ Exempt from SB2 fee per GC 27388.1(a)(2); recorded concurrently "in connection with" a transfer subject to the imposition of documentary transfer tax", or
- ☐ Exempt from SB2 fee per GC 27388.1(a)(2); is a transfer of real property that is a residential dwelling to an owner-occupier", or
- ☐ Exempt from SB2 fee per GC 27388.1(a)(2); recorded concurrently "in connection with" a transfer of real property that is a residential dwelling to an owner-occupier", or
- ☐ Exempt from SB2 fee per GC 27388.1(a)(1); fee cap of \$225 reached"
- ☐ Exempt from SB2 fee per GC 27388.1(a)(1); not related to real property

**Failure to include an exemption reason will result in the imposition of the SB2 Building Homes and Jobs Act Fee.**

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):

After recording, return to:

Brian Procel (State Bar No. 218657)  
PROCEL LAW, PC  
401 Wilshire Boulevard, 12th Floor  
Santa Monica, California 90401

TEL NO.: (424) 788-4538 FAX NO. (optional):

E-MAIL ADDRESS (Optional): brian@procel-law.com

☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, CA 90024

BRANCH NAME: Stanley Mosk Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: JOSEPH VAGO, ET AL.

DEFENDANT: LESLIE KLEIN, ET AL.

CASE NUMBER:

20STCV25050

**ABSTRACT OF JUDGMENT—CIVIL  
AND SMALL CLAIMS**

☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record  
applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address

Leslie Klein  
322 N. June Street  
Los Angeles, CA 90004

b. Driver's license no. [last 4 digits] and state:

☒ Unknown

c. Social security no. [last 4 digits]:

☒ Unknown

d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

Leslie Klein  
322 N. June Street, Los Angeles, CA 90004

2. ☒ Information on additional judgment debtors is  
shown on page 2.

3. Judgment creditor (name and address):

Joseph Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401

Date: December 14, 2022

Brian Procel

(TYPE OR PRINT NAME)

4. ☒ Information on additional judgment creditors is  
shown on page 2.

5. ☐ Original abstract recorded in this county:

a. Date:

b. Instrument No.:

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
\$24,334,038.99

7. All judgment creditors and debtors are listed on this abstract.

8. a. Judgment entered on (date): December 2, 2022

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.

10. ☐ An ☐ execution lien ☐ attachment lien  
is endorsed on the judgment as follows:

a. Amount: \$

b. In favor of (name and address):

11. A stay of enforcement has

a. ☒ not been ordered by the court.

b. ☐ been ordered by the court effective until  
(date):

12. a. ☒ I certify that this is a true and correct abstract of  
the judgment entered in this action.

b. ☐ A certified copy of the judgment is attached.

[SEAL]



Sherri R. Carter Executive Officer / Clerk of Court

This abstract issued on (date):

12/15/2022

Clerk, by M. Nguyen, Deputy



PLAINTIFF: JOSEPH VAGO, ET AL.  
DEFENDANT: LESLIE KLEIN, ET AL.

COURT CASE NO.:  
20STCV25050

**NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:**

13. Judgment creditor (*name and address*):

Erica Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:**

16. Name and last known address

Les Klein & Associates, Inc.  
1425 Ventura Blvd.  
Sherman Oaks, CA 91423

Driver's license no. [last 4 digits] and state:

☒ Unknown

Social security no. [last 4 digits]:

☒ Unknown

Summons was personally served at or mailed to (*address*):  
322 N. June Street  
Los Angeles, CA 90004

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

**RECORDING REQUESTED  
AND WHEN RECORDED MAIL TO:**

Brian Procel  
PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401



111.00

\* \$ R 0 0 1 4 1 5 2 5 0 1 \$ \*

2023000009373 3:06 pm 01/12/23

227 NC-5 A03 3

0.00 0.00 0.00 0.00 6.00 20.00 0.000.0075.00 3.00

THIS SPACE IS FOR RECORDERS USE ONLY

Amended Abstract of Judgment

(Title of Document)

***Per Government Code 27388.1(a)(1) "A fee of \$75 dollars shall be paid at the time of recording on every real estate instrument, paper, or notice required or permitted by law to be recorded, except those expressly exempted from payment of recording fees, per each single transaction per parcel or real property. "***

- ☐ Exempt from SB2 fee per GC 27388.1(a)(2); is a transfer subject to the imposition of documentary transfer tax", or
- ☐ Exempt from SB2 fee per GC 27388.1(a)(2); recorded concurrently "in connection with" a transfer subject to the imposition of documentary transfer tax", or
- ☐ Exempt from SB2 fee per GC 27388.1(a)(2); is a transfer of real property that is a residential dwelling to an owner-occupier", or
- ☐ Exempt from SB2 fee per GC 27388.1(a)(2); recorded concurrently "in connection with" a transfer of real property that is a residential dwelling to an owner-occupier", or
- ☐ Exempt from SB2 fee per GC 27388.1(a)(1); fee cap of \$225 reached"
- ☐ Exempt from SB2 fee per GC 27388.1(a)(1); not related to real property

**Failure to include an exemption reason will result in the imposition of the SB2 Building Homes and Jobs Act Fee.**

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):  
After recording, return to:  
Brian Procel (State Bar No. 218657)  
Martin Pritikin (State Bar No. 210845)  
PROCEL LAW, PC  
401 Wilshire Boulevard, 12th Floor  
Santa Monica, California 90401  
TEL NO.: (424) 788-4538 FAX NO. (optional):  
E-MAIL ADDRESS (Optional): brian@procel-law.com; marty@procel-law.com  
☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
STREET ADDRESS: 111 North Hill Street  
MAILING ADDRESS:  
CITY AND ZIP CODE: Los Angeles, CA 90024  
BRANCH NAME: Stanley Mosk Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: JOSEPH VAGO, ET AL.  
DEFENDANT: LESLIE KLEIN, ET AL.

CASE NUMBER:  
20STCV25050

**ABSTRACT OF JUDGMENT—CIVIL  
AND SMALL CLAIMS**

☒ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record  
applies for an abstract of judgment and represents the following:
- a. Judgment debtor's  
Name and last known address  
Leslie Klein  
322 N. June Street  
Los Angeles, CA 90004
- b. Driver's license no. [last 4 digits] and state: ☒ Unknown  
c. Social security no. [last 4 digits]: 6944 ☐ Unknown  
d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):  
Leslie Klein  
322 N. June Street, Los Angeles, CA 90004

2. ☒ Information on additional judgment debtors is shown on page 2.
3. Judgment creditor (name and address):  
Joseph Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401

4. ☒ Information on additional judgment creditors is shown on page 2.
5. ☒ Original abstract recorded in this county:  
Orange  
a. Date: December 16, 2022  
b. Instrument No.: 2022000409986

Date: January 11, 2023  
Brian Procel

(TYPE OR PRINT NAME)

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
\$24,334,038.99
7. All judgment creditors and debtors are listed on this abstract.
8. a. Judgment entered on (date): December 2, 2022  
b. Renewal entered on (date):

10. ☐ An ☐ execution lien ☐ attachment lien  
is endorsed on the judgment as follows:  
a. Amount: \$  
b. In favor of (name and address):

9. ☐ This judgment is an installment judgment.

11. A stay of enforcement has  
a. ☒ not been ordered by the court.  
b. ☐ been ordered by the court effective until (date):
12. a. ☒ I certify that this is a true and correct abstract of the judgment entered in this action.  
b. ☐ A certified copy of the judgment is attached.

(SEAL)



David W. Slayton, Executive Officer/Clerk of Court

This abstract issued on (date):  
01/12/2023

Clerk, by M. Nguyen, Deputy

PLAINTIFF: JOSEPH VAGO, ET AL. DEFENDANT: LESLIE KLEIN, ET AL.	COURT CASE NO.: 20STCV25050
---	--------------------------------

**NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:**

13. Judgment creditor (*name and address*):

Erica Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:**

16. Name and last known address

Les Klein & Associates, Inc.  
1425 Ventura Blvd.  
Sherman Oaks, CA 91423

Driver's license no. [last 4 digits] and state:

☒ Unknown

Social security no. [last 4 digits]:

☒ Unknown

Summons was personally served at or mailed to (*address*):

322 N. June Street  
Los Angeles, CA 90004

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

PLEASE COMPLETE THIS INFORMATION  
RECORDING REQUESTED BY:

Procel Law, PC

AND WHEN RECORDED MAIL TO:  
AND MAIL TAX STATEMENTS TO:

Brian Procel

Procel Law, PC

401 Wilshire Blvd., 12th Floor

Santa Monica, CA 90401

Page 1 of 3  
Recorded in Official Records  
County of Riverside  
Peter Aldana  
Assessor-County Clerk-Recorder

\*\*This document was electronically submitted  
to the County of Riverside for recording\*\*  
Received by: NORMA #248

Space above this line for recorder's use only

### Abstract of Judgment

Title of Document

TRA: \_\_\_\_\_

DTT: \_\_\_\_\_

Pursuant to Senate Bill 2 – Building Homes and Jobs Act (GC Code Section 27388.1), effective January 1, 2018, a fee of seventy-five dollars (\$75.00) shall be paid at the time of recording of every real estate instrument, paper, or notice required or permitted by law to be recorded, except those expressly exempted from payment of recording fees, per each single transaction per parcel of real property. The fee imposed by this section shall not exceed two hundred twenty-five dollars (\$225.00).

- ☐ This document is a transfer that is subject to the imposition of documentary transfer tax.
- ☐ This is a document recorded in connection with a transfer that is subject to the imposition of documentary transfer tax.  
Document reference: \_\_\_\_\_
- ☐ This document is a transfer of real property that is a residential dwelling to an owner-occupier.
- ☐ This is a document recorded in connection with a transfer of real property that is a residential dwelling to an owner-occupier.  
Document reference: \_\_\_\_\_

THIS PAGE ADDED TO PROVIDE ADEQUATE SPACE FOR RECORDING INFORMATION  
(\$3.00 Additional Recording Fee Applies)

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):

After recording, return to:

Brian Procel (State Bar No. 218657)  
PROCEL LAW, PC  
401 Wilshire Boulevard, 12th Floor  
Santa Monica, California 90401

TEL NO.: (424) 788-4538 FAX NO. (optional):

E-MAIL ADDRESS (Optional): brian@procel-law.com

☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, CA 90024

BRANCH NAME: Stanley Mosk Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: JOSEPH VAGO, ET AL.

DEFENDANT: LESLIE KLEIN, ET AL.

CASE NUMBER:

20STCV25050

**ABSTRACT OF JUDGMENT—CIVIL  
AND SMALL CLAIMS**

☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record  
applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address

Leslie Klein  
322 N. June Street  
Los Angeles, CA 90004

b. Driver's license no. [last 4 digits] and state:

☒ Unknown

c. Social security no. [last 4 digits]:

☒ Unknown

d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

Leslie Klein  
322 N. June Street, Los Angeles, CA 90004

2. ☒ Information on additional judgment debtors is  
shown on page 2.

3. Judgment creditor (name and address):

Joseph Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401

Date: December 14, 2022

Brian Procel

(TYPE OR PRINT NAME)

4. ☒ Information on additional judgment creditors is  
shown on page 2.

5. ☐ Original abstract recorded in this county:

a. Date:

b. Instrument No.:

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
\$24,334,038.99

7. All judgment creditors and debtors are listed on this abstract.

8. a. Judgment entered on (date): December 2, 2022

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.

10. ☐ An ☐ execution lien ☐ attachment lien  
is endorsed on the judgment as follows:

a. Amount: \$

b. In favor of (name and address):

11. A stay of enforcement has

a. ☒ not been ordered by the court.

b. ☐ been ordered by the court effective until  
(date):

12. a. ☒ I certify that this is a true and correct abstract of  
the judgment entered in this action.

b. ☐ A certified copy of the judgment is attached.

[SEAL]



Sherri R. Carter Executive Officer / Clerk of Court

This abstract issued on (date):

12/15/2022

Clerk, by M. Nguyen, Deputy

PLAINTIFF: JOSEPH VAGO, ET AL. DEFENDANT: LESLIE KLEIN, ET AL.	COURT CASE NO.: 20STCV25050
---	--------------------------------

**NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:**

13. Judgment creditor (*name and address*):

Erica Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:**

16. Name and last known address

Les Klein & Associates, Inc.  
1425 Ventura Blvd.  
Sherman Oaks, CA 91423

Driver's license no. [last 4 digits] and state:

☒ Unknown

Social security no. [last 4 digits]:

☒ Unknown

Summons was personally served at or mailed to (*address*):

322 N. June Street  
Los Angeles, CA 90004

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

RECORDING REQUESTED BY

Procel Law, PC

AND WHEN RECORDED MAIL DOCUMENT TO:

NAME Brian Procel

STREET ADDRESS 401 Wilshire Blvd., 12th Floor

CITY, STATE & ZIP CODE Santa Monica, CA 90401



Electronically  
Recorded in Official Records  
San Bernardino County

Assessor-Recorder-County Clerk

DOC# 2023-0009468

01/12/2023

03:35 PM

SAN

V0956

Titles: 1 Pages: 3

Fees	\$32.00
Taxes	\$ 0.00
CA SB2 Fee	\$75.00
Total	\$107.00

SPACE ABOVE FOR RECORDER'S USE ONLY

## Abstract of Judgment

### Title of Document

Pursuant to Assembly Bill 1466 – Restrictive Covenant (GC Code Section 27388.2), effective July 1, 2022, a fee of two dollars (\$2) for recording the first page of every instrument, paper, or notice required or permitted by law to be recorded per each single transaction per parcel of real property, except those expressly exempted from payment of recording fees, as authorized by each county's board of supervisors and in accordance with applicable constitutional requirements.

Pursuant to Senate Bill 2 – Building Homes and Jobs Act (GC Code Section 27388.1), effective January 1, 2018, a fee of seventy-five dollars (\$75.00) shall be paid at the time of recording of every real estate instrument, paper, or notice required or permitted by law to be recorded, except those expressly exempted from payment of recording fees, per each single transaction per parcel of real property. The fee imposed by this section shall not exceed two hundred twenty-five dollars (\$225.00).

#### Reason for Exemption:

Exempt from fee per GC 27388.1, recorded in connection with a transfer subject to the imposition of documentary transfer tax (DTT), or

Exempt from fee per GC 27388.1, recorded in connection with a transfer of real property that is a residential dwelling to an owner-occupier, or

Exempt from fee per GC 27388.1, recorded in connection with a transfer that was subject to documentary transfer tax which was paid on document recorded previously on \_\_\_\_\_(date) as document number \_\_\_\_\_of Official Records. (Cap. \$225.00)

Exempt from fee per GC 27388.1, fee cap of \$225.00 reached, and/or

Exempt from fee per GC 27388.1, not related to real property

Failure to include an exemption reason will result in the imposition of the \$75.00 Building Homes and Jobs Act fee. Fees collected are deposited to the State and may not be available for refund.

THIS COVER SHEET ADDED TO PROVIDE ADEQUATE SPACE FOR RECORDING INFORMATION  
(\$3.00 Additional Recording Fee Applies)



EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):  
After recording, return to:  
Brian Procel (State Bar No. 218657)  
Martin Pritikin (State Bar No. 210845)  
PROCEL LAW, PC  
401 Wilshire Boulevard, 12th Floor  
Santa Monica, California 90401  
TEL NO.: (424) 788-4538 FAX NO. (optional):  
E-MAIL ADDRESS (Optional): brian@procel-law.com; marty@procel-law.com  
☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
STREET ADDRESS: 111 North Hill Street  
MAILING ADDRESS:  
CITY AND ZIP CODE: Los Angeles, CA 90024  
BRANCH NAME: Stanley Mosk Courthouse

FOR RECORDER'S USE ONLY

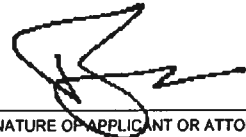
PLAINTIFF: JOSEPH VAGO, ET AL.  
DEFENDANT: LESLIE KLEIN, ET AL.

CASE NUMBER:  
20STCV25050

**ABSTRACT OF JUDGMENT—CIVIL  
AND SMALL CLAIMS**

☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record applies for an abstract of judgment and represents the following:
- a. Judgment debtor's Name and last known address  
Leslie Klein  
322 N. June Street  
Los Angeles, CA 90004
- b. Driver's license no. [last 4 digits] and state: ☒ Unknown
- c. Social security no. [last 4 digits]: 6944 ☐ Unknown
- d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):  
Leslie Klein  
322 N. June Street, Los Angeles, CA 90004
2. ☒ Information on additional judgment debtors is shown on page 2.
3. Judgment creditor (name and address):  
Joseph Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401  
Date: January 11, 2023  
Brian Procel  
(TYPE OR PRINT NAME)
4. ☒ Information on additional judgment creditors is shown on page 2.
5. ☐ Original abstract recorded in this county:
- a. Date:  
b. Instrument No.:   
(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
\$24,334,038.99
7. All judgment creditors and debtors are listed on this abstract.
8. a. Judgment entered on (date): December 2, 2022  
b. Renewal entered on (date):
9. ☐ This judgment is an installment judgment.

10. ☐ An ☐ execution lien ☐ attachment lien is endorsed on the judgment as follows:  
a. Amount: \$  
b. In favor of (name and address):

11. A stay of enforcement has  
a. ☒ not been ordered by the court.  
b. ☐ been ordered by the court effective until (date):
12. a. ☒ I certify that this is a true and correct abstract of the judgment entered in this action.  
b. ☐ A certified copy of the judgment is attached.



David W. Slayton, Executive Officer/Clerk of Court

This abstract issued on (date):  
01/12/2023

Clerk, by M. Nguyen, Deputy

PLAINTIFF: JOSEPH VAGO, ET AL. DEFENDANT: LESLIE KLEIN, ET AL.	COURT CASE NO.: 20STCV25050
---	--------------------------------

**NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:**

13. Judgment creditor (*name and address*):

Erica Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:**

16. Name and last known address

Les Klein & Associates, Inc.  
1425 Ventura Blvd.  
Sherman Oaks, CA 91423

Driver's license no. [last 4 digits] and state:

☒ Unknown

Social security no. [last 4 digits]:

☒ Unknown

Summons was personally served at or mailed to (*address*):

322 N. June Street  
Los Angeles, CA 90004

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

PLEASE COMPLETE THIS INFORMATION.

RECORDING REQUESTED BY:

Procel Law, PC

AND WHEN RECORDED MAIL TO:

Brian Procel  
PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

DOC# 2023-0009943



Jan 12, 2023 03:06 PM

OFFICIAL RECORDS  
JORDAN Z. MARKS,  
SAN DIEGO COUNTY RECORDER  
FEES: \$95.00 (SB2 Atkins: \$75.00)

PAGES: 3

THIS SPACE FOR RECORDER'S USE ONLY

## Abstract of Judgment

(Please fill in document title(s) on this line)

THIS PAGE ADDED TO PROVIDE ADEQUATE SPACE FOR RECORDING INFORMATION  
(Additional recording fee applies)

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):  
After recording, return to:  
Brian Procel (State Bar No. 218657)  
Martin Pritikin (State Bar No. 210845)  
PROCEL LAW, PC  
401 Wilshire Boulevard, 12th Floor  
Santa Monica, California 90401  
TEL NO.: (424) 788-4538 FAX NO. (optional):  
E-MAIL ADDRESS (Optional): brian@procel-law.com; marty@procel-law.com  
☒ ATTORNEY ☒ JUDGMENT ☐ ASSIGNEE  
FOR CREDITOR OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
STREET ADDRESS: 111 North Hill Street  
MAILING ADDRESS:  
CITY AND ZIP CODE: Los Angeles, CA 90024  
BRANCH NAME: Stanley Mosk Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: JOSEPH VAGO, ET AL.  
DEFENDANT: LESLIE KLEIN, ET AL.

CASE NUMBER:  
20STCV25050

**ABSTRACT OF JUDGMENT—CIVIL  
AND SMALL CLAIMS**

☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record  
applies for an abstract of judgment and represents the following:
- a. Judgment debtor's  
Name and last known address  
Leslie Klein  
322 N. June Street  
Los Angeles, CA 90004
- b. Driver's license no. [last 4 digits] and state: ☒ Unknown  
c. Social security no. [last 4 digits]: 6944 ☐ Unknown  
d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):  
Leslie Klein  
322 N. June Street, Los Angeles, CA 90004

2. ☒ Information on additional judgment debtors is  
shown on page 2.
3. Judgment creditor (name and address):  
Joseph Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401  
Date: January 11, 2023  
Brian Procel  
(TYPE OR PRINT NAME)

4. ☒ Information on additional judgment creditors is  
shown on page 2.
5. ☐ Original abstract recorded in this county:

- a. Date:  
b. Instrument No.:

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
\$24,334,038.99
7. All judgment creditors and debtors are listed on this abstract.
8. a. Judgment entered on (date): December 2, 2022  
b. Renewal entered on (date):
9. ☐ This judgment is an installment judgment.

10. ☐ An ☐ execution lien ☐ attachment lien  
is endorsed on the judgment as follows:  
a. Amount: \$  
b. In favor of (name and address):

11. A stay of enforcement has  
a. ☒ not been ordered by the court.  
b. ☐ been ordered by the court effective until  
(date):
12. a. ☒ I certify that this is a true and correct abstract of  
the judgment entered in this action.  
b. ☐ A certified copy of the judgment is attached.



David W. Slayton, Executive Officer/Clerk of Court

This abstract issued on (date):  
01/12/2023

Clerk, by M. Nguyen, Deputy

PLAINTIFF: JOSEPH VAGO, ET AL. DEFENDANT: LESLIE KLEIN, ET AL.	COURT CASE NO.: 20STCV25050
---	--------------------------------

**NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:**

13. Judgment creditor (*name and address*):

Erica Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:**

16. Name and last known address

Les Klein & Associates, Inc.  
1425 Ventura Blvd.  
Sherman Oaks, CA 91423

Driver's license no. [last 4 digits] and state:

☒ Unknown

Social security no. [last 4 digits]:

☒ Unknown

Summons was personally served at or mailed to (*address*):

322 N. June Street  
Los Angeles, CA 90004

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

PLEASE COMPLETE THIS INFORMATION

RECORDING REQUESTED BY:

Procel Law, PC

AND WHEN RECORDED MAIL TO:

Brian Procel

Procel Law, PC

401 Wilshire Blvd., 12th Floor

Santa Monica, CA 90401

Mark A. Lunn  
Ventura County Clerk-Recorder

**DOC# 2022000116414**

12/16/2022

Titles: 1 Pages: 3

10:52 AM

Total Fees: \$137.00

CORRAE

eRecorded by CSC/Ingeo

**LIEN NOTICE MAILED**

**Abstract of Judgment**

(Please fill in document title(s) on this line)

The document to which this page is affixed and made a part of is exempt from the fee imposed by the Building Homes & Jobs Act (SB 2-2017) (GC 27388.1)

Reason for exemption:

- ☐ Not related to real property - GC 27388.1 (a) (1)
- ☐ Recorded concurrently "in connection with" a transfer subject to the imposition of Documentary Transfer Tax - GC 27388.1 (a) (2)
- ☐ Transfer of real property that is a residential dwelling to an owner-occupier *or* recorded concurrently "in connection with" a transfer of real property that is a residential dwelling to an owner-occupier - GC 27388.1 (a) (2)
- ☐ Maximum \$225.00 fee per transaction reached (presented concurrently and are related to the same parties and same property) - GC 27388.1 (a) (1)

THIS PAGE ADDED TO PROVIDE ADEQUATE SPACE FOR RECORDING INFORMATION  
(Additional recording fee applies)

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):

After recording, return to:

Brian Procel (State Bar No. 218657)  
PROCEL LAW, PC  
401 Wilshire Boulevard, 12th Floor  
Santa Monica, California 90401

TEL NO.: (424) 788-4538 FAX NO. (optional):

E-MAIL ADDRESS (Optional): brian@procel-law.com

☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, CA 90024

BRANCH NAME Stanley Mosk Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: JOSEPH VAGO, ET AL.

DEFENDANT: LESLIE KLEIN, ET AL.

CASE NUMBER:

20STCV25050

**ABSTRACT OF JUDGMENT—CIVIL  
AND SMALL CLAIMS**

☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record  
applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address

Leslie Klein  
322 N. June Street  
Los Angeles, CA 90004

Lien Notice Mailed to Debtor at  
address shown. Govt Code 27297.5

b. Driver's license no. [last 4 digits] and state:

☒ Unknown

c. Social security no. [last 4 digits]:

☒ Unknown

d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

Leslie Klein  
322 N. June Street, Los Angeles, CA 90004

2. ☒ Information on additional judgment debtors is  
shown on page 2.

4. ☒ Information on additional judgment creditors is  
shown on page 2.

3. Judgment creditor (name and address):

Joseph Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401

5. ☐ Original abstract recorded in this county:

a. Date:

b. Instrument No.:

Date: December 14, 2022

Brian Procel

(TYPE OR PRINT NAME)

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
\$24,334,038.99

10. ☐ An ☐ execution lien ☐ attachment lien  
is endorsed on the judgment as follows:

7. All judgment creditors and debtors are listed on this abstract.

a. Amount: \$

8. a. Judgment entered on (date): December 2, 2022

b. In favor of (name and address):

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.

11. A stay of enforcement has

a. ☒ not been ordered by the court.

b. ☐ been ordered by the court effective until  
(date):

12. a. ☒ I certify that this is a true and correct abstract of  
the judgment entered in this action.

b. ☐ A certified copy of the judgment is attached.

[SEAL]



Sherri R. Carter Executive Officer / Clerk of Court

This abstract issued on (date):

12/15/2022

Clerk, by M. Nguyen, Deputy

PLAINTIFF: JOSEPH VAGO, ET AL. DEFENDANT: LESLIE KLEIN, ET AL.	COURT CASE NO.: 20STCV25050
---	--------------------------------

**NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:**

13. Judgment creditor (*name and address*):

Erica Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:**

16. Name and last known address

Les Klein & Associates, Inc.  
1425 Ventura Blvd.  
Sherman Oaks, CA 91423

**Lien Notice Mailed to Debtor at  
address shown. Govt Code 27297.5**

Driver's license no. [last 4 digits] and state:

☒ Unknown

Social security no. [last 4 digits]:

☒ Unknown

Summons was personally served at or mailed to (*address*):

322 N. June Street  
Los Angeles, CA 90004

17.

Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19.

Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.



PLEASE COMPLETE THIS INFORMATION

RECORDING REQUESTED BY:

Procel Law, PC

AND WHEN RECORDED MAIL TO:

Brian Procel

Procel Law, PC

401 Wilshire Blvd., 12th Floor

Santa Monica, CA 90401

Electronically Recorded in Official Records  
County of Ventura County

Michelle Ascencion

Ventura County Clerk-Recorder

**DOC# 2023000002104**

01/12/2023

Titles: 1 Pages: 3

11:56 AM

Total Fees: \$137.00

HERND

eRecorded by CSC/Ingeo

**LIEN NOTICE MAILED**

Amended Abstract of Judgment

(Please fill in document title(s) on this line)

The document to which this page is affixed and made a part of is exempt from the fee imposed by the Building Homes & Jobs Act (SB 2-2017) (GC 27388.1)

Reason for exemption:

- ☐ Not related to real property - GC 27388.1 (a) (1)
- ☐ Recorded concurrently "in connection with" a transfer subject to the imposition of Documentary Transfer Tax - GC 27388.1 (a) (2)
- ☐ Transfer of real property that is a residential dwelling to an owner-occupier *or* recorded concurrently "in connection with" a transfer of real property that is a residential dwelling to an owner-occupier - GC 27388.1 (a) (2)
- ☐ Maximum \$225.00 fee per transaction reached (presented concurrently and are related to the same parties and same property) - GC 27388.1 (a) (1)

THIS PAGE ADDED TO PROVIDE ADEQUATE SPACE FOR RECORDING INFORMATION  
(Additional recording fee applies)

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):  
After recording, return to:  
Brian Procel (State Bar No. 218657)  
Martin Pritikin (State Bar No. 210845)  
PROCEL LAW, PC  
401 Wilshire Boulevard, 12th Floor  
Santa Monica, California 90401  
TEL NO.: (424) 788-4538 FAX NO. (optional):  
E-MAIL ADDRESS (Optional): brian@procel-law.com; marty@procel-law.com  
☒ ATTORNEY ☒ JUDGMENT ☐ ASSIGNEE  
FOR CREDITOR OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, CA 90024

BRANCH NAME: Stanley Mosk Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: JOSEPH VAGO, ET AL.

DEFENDANT: LESLIE KLEIN, ET AL.

CASE NUMBER:

20STCV25050

**ABSTRACT OF JUDGMENT—CIVIL  
AND SMALL CLAIMS**

☒ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record  
applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address

Leslie Klein

322 N. June Street

Los Angeles, CA 90004

Lien Notice Mailed to Debtor at

address shown. Govt Code 27297.5

b. Driver's license no. [last 4 digits] and state:

☒ Unknown

c. Social security no. [last 4 digits]: 6944

☐ Unknown

d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

Leslie Klein

322 N. June Street, Los Angeles, CA 90004

2. ☒ Information on additional judgment debtors is  
shown on page 2.

3. Judgment creditor (name and address):

Joseph Vago

c/o PROCEL LAW, PC

401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401

Date: January 11, 2023

Brian Procel

(TYPE OR PRINT NAME)

4. ☒ Information on additional judgment creditors is  
shown on page 2.

5. ☒ Original abstract recorded in this county:  
Ventura

a. Date: December 16, 2022

b. Instrument No.: 2022000116414

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
\$24,334,038.99

7. All judgment creditors and debtors are listed on this abstract.

8. a. Judgment entered on (date): December 2, 2022

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.



This abstract issued on (date):

01/12/2023

10. ☐ An ☐ execution lien ☐ attachment lien  
is endorsed on the judgment as follows:

a. Amount: \$

b. In favor of (name and address):

11. A stay of enforcement has

a. ☒ not been ordered by the court.

b. ☐ been ordered by the court effective until  
(date):

12. a. ☒ I certify that this is a true and correct abstract of  
the judgment entered in this action.

b. ☐ A certified copy of the judgment is attached.

David W. Slayton, Executive Officer/Clerk of Court

Clerk, by B. Portier, Deputy

PLAINTIFF: JOSEPH VAGO, ET AL. DEFENDANT: LESLIE KLEIN, ET AL.	COURT CASE NO.: 20STCV25050
---	--------------------------------

**NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:**

13. Judgment creditor (*name and address*):

Erica Vago  
c/o PROCEL LAW, PC  
401 Wilshire Blvd., 12th Floor  
Santa Monica, CA 90401

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:**

16. Name and last known address

Les Klein & Associates, Inc.  
1425 Ventura Blvd.  
Sherman Oaks, CA 91423  
Lien Notice Mailed to Debtor at  
address shown. Govt Code 27297.5

Driver's license no. [last 4 digits] and state:

☒ Unknown

Social security no. [last 4 digits]:

☒ Unknown

Summons was personally served at or mailed to (*address*):

322 N. June Street  
Los Angeles, CA 90004

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.



**STATE OF CALIFORNIA**  
**Office of the Secretary of State**  
**NOTICE OF JUDGMENT LIEN (JL 1)**  
 California Secretary of State  
 1500 11th Street  
 Sacramento, California 95814  
 (916) 653-3516

For Office Use Only

**-FILED-**

File No.: U230002837926

Date Filed: 1/12/2023

**Submitter Information:**

Contact Name: brian procel  
 Organization Name: procel law, PC  
 Phone Number: (424) 788-4538  
 Email Address: brian@procel-law.com  
 Address: 400 WILSHIRE BOULEVARD  
 12TH FLOOR  
 SANTA MONICA, CA 90401

**Judgment Debtor Information:**

Judgment Debtor Name	Mailing Address
leslie klein	322 n. june street los angeles, CA 90004
leslie klein & associates	14245 ventura boulevard suite 301 sherman oaks, CA 91423

**Judgment Creditor Information:**

Judgment Creditor Name	Mailing Address
erica vago	124 n. highland avenue los angeles, CA 90036
joseph vago	124 n. highland avenue los angeles, CA 90036

**Judgment Information:**

A. Name of Court Where Judgment Was Entered: Los Angeles superior court  
 B. Title of the Action: vago v. klein  
 C. Case Number: 20STCV25050  
 D. Date Judgment Was Entered: 12/02/2022

E. Date(s) of Subsequent Renewal of Judgment (if any)

None Entered

F. Date of This Notice: 01/12/2023  
 G. Amount Required to Satisfy Judgment at This Date of Notice: \$24,334,038.99

All property subject to enforcement of a Money Judgment against the Judgment Debtor to which a Judgment Lien on personal property may attach under Section 697.530 of the Code of Civil Procedure is subject to this Judgment Lien.

**Declaration and Signature:**

Declaration: I am representing the legal firm that is the Attorney of Record for the Judgment Creditor.

Organization Name: Procel Law, PC

☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

*Brian procel*

01/12/2023

Sign Here

Date

B1399-4406 01/12/2023 12:20 PM Received by California Secretary of State

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
9454 Wilshire Blvd., 6<sup>th</sup> FL., Beverly Hills, CA 90212

A true and correct copy of the foregoing document entitled (*specify*): **COMPLAINT FOR (1) AVOIDANCE OF PREFERENCE (2) RECOVER OF AVOIDED TRANSFER AND (3) AUTOMATIC PRESERVATION OF AVOIDED TRANSFER** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 5/5/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) 5/5/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Joseph Vago and Erica Vago  
c/o Brian A. Procel/Procel Law, PC  
401 Wilshire Blvd., 12<sup>th</sup> Fl.  
Santa Monica, CA 90401

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 5/5/2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Sandra Klein  
United States Bankruptcy Court  
Central District of California  
Edward R. Roybal Federal Building and Courthouse  
255 E. Temple Street, Suite 1582 / Courtroom 1575  
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

5/5/2023

*Date*

Peter Garza

*Printed Name*

/s/Peter Garza

*Signature*

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

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**U.S. Trustee: Michael Jones** michael.jones4@usdoj.gov  
**U.S. Trustee: Ron Maroko** ron.maroko@usdoj.gov  
**Counsel for Ajax Mortgage: Joshua L Scheer** jscheer@scheerlawgroup.com, jscheer@ecf.courtdrive.com  
**Subchapter V Trustee: Mark M Sharf (TR)** mark@sharfllaw.com, C188@ecfcbis.com;sharf1000@gmail.com  
**United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov  
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**Counsel for First Amendment Wendrigger Family Trust dated May 7, 1990: Clarisse Young**  
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